

**Before the
Pennsylvania Public Utility Commission**

In the Matter of)
)
Centre WISP Venture Company, LLC) Docket No. _____
)
Petition for Designation as an)
Eligible Telecommunications Carrier)
Pursuant to Section 214(e)(2) of the Act)

**PETITION FOR ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION**

Pursuant to section 214(e)(2) of the Communications Act of 1934 (“Act”) and the rules of the Federal Communications Commission (“FCC”), and the requirements of the Pennsylvania Public Utility Commission (“Commission” or “PUC”), as set forth in 52 Pa. Code § 69.2501,¹ Centre WISP Venture Company, LLC (“Centre” or “Company”) respectfully requests designation as a high-cost eligible telecommunications carrier (“ETC”) in the State of Pennsylvania for a service area comprised of the 735 funded census blocks in its winning bids in the recent FCC Rural Digital Opportunity Fund (“RDOF”) Phase I auction, as more fully described below.

On December 7, 2020, the FCC announced the winning bidders for the RDOF Phase I auction.² As receipt of \$11,086,348.40 in funding over a ten-year period (\$1,108,634.84 annually) is contingent upon the Company’s designation as an ETC for the supported areas, Centre respectfully requests that the PUC expeditiously review and approve this Application in order to accelerate the deployment of critical broadband and voice services in these rural areas. Centre is obligated to submit to the FCC documentation

¹ See *Final Policy Statement on Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an Eligible Telecommunications Carrier (ETC) for Purposes of Federal Universal Service Support*, Docket No. M-2010-2164741 (Order entered August 2, 2010) (*ETC Guidelines Order*); see also *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) (*2005 ETC Designation Order*).

² *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced*, Public Notice, DA No. 20-1422 (OEA/WCB rel. Dec. 7, 2020) (*RDOF Auction Closing Public Notice*).

of its ETC designation within 180 days of the *RDOF Auction Closing Public Notice* in order to be authorized to receive RDOF support,³ and it therefore requests action on this Petition before June 7, 2021, in order to meet this FCC deadline.

I. BACKGROUND

A. The Company

Centre WISP Venture Company, LLC was formed in 2019,⁴ is registered to do business in Pennsylvania, and is headquartered in State College, PA. Centre has focused its efforts on delivering broadband internet connectivity to otherwise un-served and under-served areas.⁵ Centre has scaled the business quickly and organically, and is operationally prepared to operate as an ETC in the Commonwealth.

Centre WISP presently provides broadband service using fixed-wireless facilities and has deployed equipment through commercial tower partnerships in addition to government tower partnerships. In order to deliver service to hard-to-reach areas, Centre WISP also has deployed countless repeaters by partnering with residents who also need broadband service. While this method has scaled quickly and proven to be reliable over time, in order to meet its RDOF obligations, Centre WISP will be expanding into deploying fiber-to-the-home in order to provide the unparalleled bandwidth and reliability of a fiber optic connection.

Centre WISP is proud to operate as a partner within the communities in which we do business, offering free wi-fi hotspots in several locations, and supporting local nonprofits. Centre has grown the

³ See 47 CFR § 54.315(b)(5).

⁴ While Centre was formed in 2019, its predecessor has been operating in the Commonwealth since 2015. The current owner of Centre, David Gibbons, founded a company in 2015 to provide broadband Internet access service in a rural area of central Pennsylvania that was not adequately served by the incumbent, Verizon. In 2017, Gibbons sold the business to another company, but then in 2019, Centre, owned by Gibbons, repurchased the business in order to continue to provide broadband service to customers in a Pennsylvania area otherwise unserved.

⁵ The incumbent price cap carrier in the area, Verizon, turned down the offer of Connect America Fund Phase II model-based support in Pennsylvania in 2015. Today, Verizon only offers DSL service that is advertised as providing 5 Mbps downstream, but most customers get only 1 Mbps downstream in practice. Verizon also offers 4G service, but with a 50 GB monthly data cap that prevents users from using that service as an adequate fixed broadband service substitute.

subscribership of the business by nearly ten-fold in the last year. It currently offers service without data caps. In the last year, Centre has actively invested in its network, increasing network bandwidth to the multi-gigabit level, extending fiber to two of its towers, adding three new towers, and 13 new repeater sites.

Centre plans to deploy a Gigabit Passive Optical Network in order to provide gigabit service to homes and businesses in the areas where authorized to receive RDOF funding. Centre will leverage a combination of active Dense Wavelength Division Multiplexing over existing dark fiber networks and Passive Optical Networks to bring gigabit-class service directly into the homes of end users. Building from splices that will be placed on the dark fiber network for which Centre has already secured an Indefeasible Right of Use (“IRU”), Centre will construct a new fiber network, and associated light generation and routing equipment, to the corners of its RDOF funded areas in order to provide its various service offerings to residents and businesses.

Upon completion of the FCC’s application process and authorization of funding, Centre will receive \$11,086,348.40 in funding over a ten-year period in exchange for offering voice and gigabit broadband services to 6,607 homes and small businesses. Exhibit A is a list of the census blocks in Pennsylvania for which Centre seeks high-cost ETC designation from the Commission in order to receive RDOF support.⁶ Those census blocks are within Centre, Huntington, Juniata, Mifflin, Northumberland, and Snyder counties in Pennsylvania.

Centre will be a facilities-based provider that focuses on serving specific rural areas in Pennsylvania. Centre plans to offer several tiers of Internet service, including service that meets the RDOF requirement of providing at least 1 Gigabit downstream/500 Mbps upstream, and will provide its customers with voice grade access to the Public Switched Telephone Network (“PSTN”) through its interconnected Voice over Internet Protocol (“VoIP”) service.

⁶ See Exhibit A (List of Census Blocks in which Centre WISP Venture Company, LLC Seeks Eligible Telecommunications Carrier Designation).

B. The Rural Digital Opportunity Fund

The FCC established the RDOF as a continuation of its efforts over nearly a decade to accelerate the deployment of high-speed fixed broadband service to all Americans. The program is being implemented in two phases, with the recently completed Phase I auction focused on areas that are wholly unserved under the FCC's current 25/3 Mbps standard for fixed broadband. The FCC will authorize RDOF support to companies that commit to deploy and maintain voice and broadband service meeting the FCC's requirements to a specified number of locations (homes and small businesses) in the identified high-cost areas.

In order to participate in RDOF, interested parties must complete a two-step application process, with competitive bidding to determine who will receive funding and the amount of funding to be provided for a particular geographic area. The FCC determined which applicants were qualified to bid in the auction by evaluating information submitted in the so-called "short-form" application. The RDOF Phase I auction began on October 29, 2020 and concluded on November 25, 2020. As noted above, on December 7, 2020, the FCC issued a Public Notice, officially announcing the results of the competitive bidding process. In order to receive funding, winning bidders must complete a "long-form" application review process to demonstrate their financial and technical qualifications to deliver the intended service and meet other requirements.

As discussed in more detail below, the Commission has the authority to grant Centre's petition for ETC designation pursuant to section 214(e)(2) of the Act, and Centre meets all of the statutory and regulatory requirements for ETC designation, both federal and state.

II. THE COMMISSION HAS AUTHORITY TO GRANT THE REQUESTED ETC DESIGNATION

Pursuant to section 214(e)(2) of the Act, a "State commission shall on its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible

telecommunications carrier for a service area designated by the State commission.”⁷ Section 214(e)(1), in turn, states:

A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received –

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

III. CENTRE MEETS THE STATUTORY AND REGULATORY REQUIREMENTS TO BE DESIGNATED AS AN ETC

As demonstrated herein, Centre satisfies each of the statutory and regulatory requirements set forth in the Act, the FCC’s rules, and Pennsylvania-specific requirements.

A. Centre Will Provide Service as a Common Carrier

Pursuant to section 153(10) of the Act, “common carrier” is defined as “any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio[.]” 47 U.S.C. § 153(10). A carrier is eligible under section 54.201 of the FCC’s rules so long as it offers the services set forth in section 54.101, either through its own facilities or a combination of its own facilities and the resale of another carrier’s services and advertises the availability of such supported services using media of general distribution. Common carriers that provide services consistent with the requirements of section 214(e) may be designated ETCs.

As set forth herein, Centre will be capable of providing the supported service over its own network infrastructure. For purposes of obtaining ETC designation, Centre certifies that it will offer the

⁷ 47 U.S.C. § 214(e)(2).

supported service in its requested service area as a common carrier under sections 214(e)(1) and 214(e)(2) of the Act.⁸

B. Centre Will Offer the Services Supported by the Federal Universal Service Support Mechanisms Throughout the Service Area for Which ETC Designation is Granted

For RDOF Phase I support recipients, the FCC defines the supported service as qualifying voice service and conditions grant of funding on the offering of qualifying broadband service.⁹ In the 2011 *USF/ICC Transformation Order*, the FCC modified the definition of a supported service to reflect a technologically neutral approach, enabling companies to provision voice service over any platform, including both the PSTN and Internet Protocol-based networks.¹⁰ Section 54.101 of the FCC’s rules was amended to specify that the functionalities of eligible voice telephony services include voice grade access to the PSTN *or its functional equivalent*.¹¹

As described below, Centre certifies that it will provide the following services that are supported by the federal universal service support mechanisms.¹²

1. Voice Telephony – Centre will offer interconnected VoIP service on a stand-alone basis using a third-party provider for PSTN interconnection and using a software-based switching platform called Asterisk.¹³ Centre will be legally responsible for

⁸ See Exhibit B (Affidavit of David Gibbons, Manager, Centre WISP Venture Company, LLC (“Gibbons Affidavit”).

⁹ 47 CFR § 54.101 (including both eligible voice telephony and eligible broadband internet access as services “supported by federal universal service support mechanisms,” and characterizing the provision of eligible broadband service as a high-cost public interest obligation); see also *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692-94, 17695, paras. 77-83, 86 (2011) (*USF/ICC Transformation Order*), *aff’d sub nom. In re: FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014) (defining “voice telephony service” as the supported service and requiring high-cost support recipients to offer broadband as a condition of receiving support).

¹⁰ See *id.* at para. 78.

¹¹ 47 CFR § 54.101(a) (emphasis added).

¹² See Exhibit B (Gibbons Affidavit).

¹³ See *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197 and 10-90, Public Notice, 33 FCC Rcd 6696, 6698-6699 (WCB 2019) (*ETC Process Public Notice*) (“a broadband provider may satisfy its voice obligation by offering voice through an affiliate or by offering a managed voice solution (including VoIP) through a third-party vendor”).

dealing with customer problems and for providing service consistent with the FCC's universal service requirements.

This service will include minutes of use for local service provided at no charge to end users (specifically, Centre's service plans will offer unlimited usage within the United States) and access to emergency services via 911 or E-911. Centre will not distinguish between the pricing of toll and non-toll calls in the pricing of its voice service, and accordingly it is not obligated to provide toll limitation services to qualifying low-income consumers.¹⁴

2. Broadband Internet Access Services – Centre's broadband Internet offering will provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service.

Centre will offer service at rates that are reasonably comparable to rates in urban areas. To meet its RDOF public interest obligations, Centre plans to offer 1 Gbps/1 Gbps broadband service for \$120.00 per month. Centre will offer standalone voice telephony for \$50.00 per month. It also expects to offer an additional service tier of 200 Mbps/200 Mbps for \$50 per month. All service offerings will have unlimited usage.

Centre commits to provide service consistent with the FCC's high-cost universal service support rules applicable to it.¹⁵ In addition, Centre will offer Lifeline discounts to qualifying low-income consumers consistent with the FCC's Lifeline rules in the RDOF-funded census blocks.¹⁶ Centre will advertise the availability of its Lifeline service offerings in the RDOF-funded census using media reasonably designed to reach those likely to qualify for that service. Centre understands its obligations to meet Lifeline requirements, such as participation in the National Lifeline Accountability Database and the Lifeline National Eligibility Verifier to qualify customers. Centre commits to complying with any additional state-specific applicable requirements regarding participation in the FCC's Lifeline program.¹⁷

¹⁴ 47 CFR § 54.401(a)(2).

¹⁵ See 47 CFR §§ 54.101(c), 54.805-54.806.

¹⁶ See *id.* § 54.101(d); *Lifeline Reform Order*, 31 FCC Rcd at 3974, 4074-75, paras. 35, 311-12 (requiring all high-cost recipients to meet Lifeline obligations in all areas where they deploy a network pursuant to a broadband service obligation and are commercially offering qualifying service).

¹⁷ See, e.g., 66 Pa. Code § 69.3101(f).

C. Centre Will Provide Service Using Its Own Facilities

All ETCs must offer qualifying voice service using their own facilities, at least in part.¹⁸ The FCC has interpreted the term “facilities,” for purposes of section 214(e) of the Act, to mean “any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support under section 254(c)(1).”¹⁹ As explained by the FCC, “a carrier need not offer universal service wholly over its own facilities in order to be designated an eligible carrier because the statute allows an eligible carrier to offer the supported services through a combination of its own facilities and resale.”²⁰ Facilities are the ETC’s “own” if the ETC has exclusive right to use the facilities to provide the supported services.²¹

Centre will be a facilities-based broadband Internet access and VoIP service provider. It will build or lease facilities used to deliver voice and broadband service in the RDOF-funded areas. In particular, as described above, it will utilize existing fiber IRUs and install associated light generation and routing equipment in order to provide its various service offerings to residents and businesses. Centre will interconnect with the PSTN using a third-party provider called Telnyx, in addition to a widely-used software switching platform called Asterisk. Centre will provide and support analog telephone adaptors to customers who wish to use its VoIP service with their legacy analog telephones.

D. Centre Will Provide Supported Service Throughout Its Designated Service Area

Centre commits to providing the supported services throughout its ETC designated service area, consistent with all applicable requirements. Centre’s requested ETC designated service area for high-cost support – specifically, the Rural Digital Opportunity Fund – is limited to the census blocks identified in Exhibit A.

¹⁸ 47 U.S.C. § 214(e)(1); 47 CFR § 54.101.

¹⁹ *Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8847, para. 128 (1997).

²⁰ *Id.* at 8870, para. 169.

²¹ *Id.* at 8866, para. 160.

E. Centre Will Advertise the Availability of Its Services and Charges Using Media of General Distribution

Centre will advertise the availability of, and charges for, its supported service offerings using media of general distribution in a manner that is designed to reach those likely to qualify for such service and plans to undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements. Centre will advertise its supported services to all eligible customers using a mix of printed materials such as direct mail, digital advertising, radio, and outreach to local newspapers and government offices,²² with a goal of ensuring every potential customer knows the service is available. Centre is well-versed in advertising to audiences who are otherwise unaware that services are available, having successfully advertised new fixed-wireless service several times across three counties in the Commonwealth. Centre also is considering marketing its service through outdoor advertising and in-person meetings with local organizations such as fire halls, rotary clubs, etc.

F. Centre Will Comply with the FCC's Additional Requirements for Designation as an ETC

In 2005, the FCC adopted section 54.202(a)(1) of its FCC's rules, requiring an ETC applicant to submit a five-year plan for proposed improvements or upgrades to the applicant's network unless the applicant is seeking Lifeline support only. However, subsequently, the FCC eliminated the five-year improvement plan requirement for price cap carriers, rate-of-return carriers and winning bidders in the context of the Connect America Fund Phase II auction.²³ Centre presumes, consistent with precedent, that the PUC will similarly not require submission of a five-year improvement plan for winning bidders in the RDOF Phase I auction.

²² Communications channels have evolved considerably in recent years to include channels beyond traditional print and broadband media. The FCC has recognized this transition for advertising to Lifeline eligible customers as well. *See Lifeline Reform Order*, paras. 362-365; *Lifeline and Link-Up*, WC Docket No. 03-109, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 8302, para. 46 (2004) (including in its guidelines that carriers may post outreach material on the Internet).

²³ *See Connect America Fund et al.*, Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Red 3087, 3166, 3168, paras. 216, 220 (2016) (eliminating five-year plan and related progress reports for federal rate-of-return and price cap carriers; *see also ETC Process Public Notice*, 33 FCC Rcd at 6699-6700).

Upon authorization to receive RDOF support, Centre will be subject to the FCC's interim and final deployment milestones, which require it to offer broadband service to at least 40% of the required number of locations by the end of the third year, 60% by the end of the fourth year, 80% by the end of the fifth year, and 100% by the end of the sixth year. Those deployment milestones represent Centre's plan for use of funding over the next five years.

Centre certifies that it possesses the financial and technical capabilities to complete construction of its planned broadband network and to meet its ETC obligations by offering voice and broadband services throughout the proposed service area. Centre will leverage existing relationships with commercial and private entities to be able to obtain the requisite amount of lending under existing lines of credit, and additional financing as necessary. As part of the FCC's long-form application process, Centre will be providing an overview of how it will finance its planned network in the RDOF-funded areas and a certification from a professional engineer that the fiber optic network is capable of delivering voice and broadband service that meets the requisite RDOF performance requirements with sufficient capacity to meet customer demand at or above the prescribed levels during peak usage.

Section 54.202(a)(2) of the FCC's rules requires that a company seeking ETC designation to demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. Centre certifies that its fiber optic network will have the ability to remain functional in emergency situations, will provide 8 hours of battery back-up power to ensure functionality without an external power source, will be able to reroute traffic around damaged facilities, and will be capable of managing traffic spikes resulting from emergency situations. Centre's fiber optic network will support telephone service using Session Initiation Protocol-based VoIP technology and will support all phone features, including 911 services.

Centre certifies that it will satisfy all consumer protection and service quality standards required by the FCC,²⁴ as well as all applicable state-specific consumer protection and service quality standards.

Centre submits that sections 54.202(a)(4)-(6) 54.202(a)(4) of the FCC's rules are inapplicable to it, as it is not seeking Lifeline-only designation anywhere in the Commonwealth. Centre understands, however, that an ETC has certain obligations to offer Lifeline service in its ETC designated service area and it commits to meeting those requirements as described below.

Section 54.405(a) of the FCC's rules requires an ETC to make available Lifeline service, as defined in section 54.401 of the FCC's rules, to qualifying low-income customers. Further, section 54.408 of the FCC's rules requires Centre to conform to certain minimum service standards for Lifeline supported services. Centre certifies that its proposed fixed voice and broadband service offering will conform to the definition of Lifeline in the FCC's rules and to the minimum service standards set forth therein.

Centre plans to offer the same Lifeline service to all customers in the RDOF-funded areas. The Lifeline offering will enable low-income households to apply the FCC's Lifeline discount to all service tiers that are generally available to all Centre customers: specifically, 1 gigabit symmetrical service for \$120 per month, and 200 Mbps symmetrical service for \$50 per month. As such, Centre's Lifeline offerings will significantly exceed the FCC's current 25/3 Mbps minimum service standards for fixed broadband Lifeline service. The Lifeline subsidy will be used to reduce the amount charged for each service offering.

Section 54.405(b) of the FCC's rules requires an ETC to publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. In addition, sections 54.405(c) and (d) of the FCC's rules require materials describing the Lifeline service (i.e., all

²⁴ See 47 CFR. § 54.202(a)(3). For applicants seeking ETC designation for the purposes of becoming authorized to receive Connect America Fund Phase II auction support, the FCC waived the requirement to submit proof of compliance with consumer protection and service quality standards—finding that the need for such requirements is obviated by specific service quality standards applicable to the winning bid areas and specific reporting obligations relating to such standards. See *ETC Process Public Notice*, 33 FCC Rcd at 6699-6700.

print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms) to contain certain disclosures and administrative information about the Lifeline service offering. Such provisions require, for example, that the materials: disclose the name of the ETC; use easily understood language to indicate that the service is a Lifeline service and that Lifeline is a government assistance program; and indicate that the service is non-transferrable, that only eligible consumers may enroll in the program, and that the program is limited to one discount per household. While Centre has not yet finalized its marketing materials for Lifeline service, Centre certifies that upon ETC designation, its marketing materials for Lifeline service will comply with these requirements.

Centre certifies that sections 54.202(c)-(e) of the FCC's rules are inapplicable to this petition, as it does not seek ETC designation to serve a Tribal land, and it is seeking designation as a high-cost ETC, not as a Lifeline broadband provider.

IV. DESIGNATION OF CENTRE AS AN ETC WILL BE IN THE PUBLIC INTEREST

Section 214(e)(2) of the Act states that, “[u]pon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier” for a designated service area, so long as the requesting carrier meets the requirements of Section 214(e)(1). Section 214(e)(2) further states: “[b]efore designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.”

In the context of the Connect America Fund Phase II auction, the FCC concluded that “carriers need not provide additional specific evidence of service to the public interest in their petitions for ETC designation.”²⁵ It reasoned that applicants were required to submit information demonstrating their ability to meet their public interest obligations in their short-form and long-form applications. Because the

²⁵ See *ETC Process Public Notice*, 33 FCC Rcd at 6701.

PUC's policy statement at 52 Pa. Code § 69.2501 adopted the FCC's standards for ETC designation set forth in 47 C.F.R. §54.202(b), Centre presumes that the PUC does not require additional evidence that grant of ETC status to Centre would serve the public interest. To the extent that the PUC requires an affirmative public interest showing, however, Centre submits that grant of its requested ETC designation would serve the public interest as described below.

Designation of Centre as an ETC in Pennsylvania will serve the public interest by facilitating the FCC's goal of deploying voice and high-speed broadband networks in rural, high-cost areas lacking 25/3 Mbps broadband service. As a recipient of federal high-cost funding, the Company will deploy advanced communications to unserved and underserved areas in Pennsylvania, offering gigabit broadband and additional services. Moreover, Centre will be the *only* provider in its proposed service area that is authorized to receive federal RDOF support for the development and deployment of this essential communications infrastructure. Centre will be obligated to deploy a network bringing new high-speed scalable broadband service to 6,607 homes and small businesses in Pennsylvania. Consequently, designating the Company as an ETC will directly benefit more than 13,200 residents of the proposed service area in Pennsylvania by ensuring that they receive the benefits of this federal funding.

Expedited designation of Centre, a locally-based service provider with roots in the community it serves, will serve the public interest by ensuring that the Company is eligible to receive federal high-cost USF support and able to deploy critical communications facilities as soon as possible. Events of the last year have made it clear, more than ever, how essential broadband is to maintain critical connections with family, education, healthcare, jobs, and more. Centre will use this funding to directly advance the FCC's goal of deploying voice and high-speed broadband-capable networks in rural, high-cost areas, while ensuring that rural communities benefit from innovations in communications technology.

In addition, designating Centre as an ETC in the requested service area will serve the public interest by making available robust fixed broadband Lifeline offerings with unlimited usage for low-income households in the RDOF-funded areas. Low-income households in the RDOF-funded areas will

benefit from having additional choices for service available, particularly because that additional choice will provide a low-income household with fixed broadband services that significantly exceed the FCC's current minimum service standards for Lifeline.

V. ANTI-DRUG ABUSE CERTIFICATION

Centre certifies that neither the petitioner nor any party to the application is subject to a denial of federal benefits, including Commission benefits, pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, as implemented in section 1.2002 of the Commission's rules.²⁶

²⁶ 47 CFR § 1.2002; *see* Exhibit B (Gibbons Affidavit).

VI. CONCLUSION

For all of the foregoing reasons, Centre respectfully requests that the Commission designate it as a high-cost ETC for the areas set forth in Exhibit A so that it may be authorized to receive RDOF Phase I support on a timely basis.

Respectfully submitted,

_____/s/_____
David Gibbons

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January 6, 2021

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EXHIBITS

EXHIBIT A:

**LIST OF CENSUS BLOCKS IN WHICH CENTRE WISP VENTURE COMPANY,
INC. SEEKS ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

EXHIBIT B:

**AFFIDAVIT OF DAVID GIBBONS, MANAGER, CENTRE WISP VENTURE
COMPANY, INC.**

EXHIBIT A

**LIST OF CENSUS BLOCKS IN WHICH CENTRE WISP VENTURE COMPANY,
LLC SEEKS ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

Census Block ID	County	Census Block Group
420270102003001	Centre	420270102003
420270102003006	Centre	420270102003
420270102003007	Centre	420270102003
420270102003031	Centre	420270102003
420270102003034	Centre	420270102003
420270102003038	Centre	420270102003
420270102003039	Centre	420270102003
420270102003043	Centre	420270102003
420270102003047	Centre	420270102003
420270102003049	Centre	420270102003
420270108001003	Centre	420270108001
420270108001007	Centre	420270108001
420270108001026	Centre	420270108001
420270108001028	Centre	420270108001
420270108001029	Centre	420270108001
420270108001030	Centre	420270108001
420270108001031	Centre	420270108001
420270108001034	Centre	420270108001
420270108001035	Centre	420270108001
420270108001036	Centre	420270108001
420270108001040	Centre	420270108001
420270108001043	Centre	420270108001
420270108001045	Centre	420270108001
420270108001046	Centre	420270108001
420270108001048	Centre	420270108001
420270108001049	Centre	420270108001
420270108001050	Centre	420270108001
420270108001051	Centre	420270108001
420270108001052	Centre	420270108001
420270108001053	Centre	420270108001
420270108001054	Centre	420270108001
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420270108001059	Centre	420270108001
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420270108001085	Centre	420270108001
420270108001087	Centre	420270108001
420270108001090	Centre	420270108001
420270108001091	Centre	420270108001
420270108001107	Centre	420270108001
420270108001111	Centre	420270108001
420270108001113	Centre	420270108001
420270108001116	Centre	420270108001
420270108001117	Centre	420270108001
420270108001121	Centre	420270108001
420270108001124	Centre	420270108001
420270108001125	Centre	420270108001
420270108001126	Centre	420270108001
420270108001127	Centre	420270108001
420270108001128	Centre	420270108001
420270108001129	Centre	420270108001
420270108001130	Centre	420270108001
420270108001132	Centre	420270108001
420270108001134	Centre	420270108001
420270108001135	Centre	420270108001
420270108002004	Centre	420270108002
420270108002013	Centre	420270108002
420270108002014	Centre	420270108002
420270108002016	Centre	420270108002
420270108002026	Centre	420270108002
420270108002032	Centre	420270108002
420270108002036	Centre	420270108002
420270108002038	Centre	420270108002
420270108002039	Centre	420270108002
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EXHIBIT B

**AFFIDAVIT OF DAVID GIBBONS, MANAGER,
CENTRE WISP VENTURE COMPANY, LLC**

Commonwealth of Pennsylvania

) SS.

COUNTY OF CENTRE

David Gibbons, after being duly sworn, states the following:

1. I have personal knowledge of the facts and information set forth in this Affidavit, and I am competent to testify to these facts if called as a witness.
2. I am the owner and Manager of Centre WISP Venture Company, LLC ("Centre"). Acting on behalf of Centre, I have read the Petition to which this Affidavit is attached. I have knowledge of the facts stated in the Petition, and those facts are true to the best of my knowledge and my belief.
3. Centre certifies that it is a common carrier under sections 214(e)(1) and 214(e)(2) of the Communications Act of 1934 ("Act").
4. Centre commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier in the service area described in the Petition.
5. Centre certifies that it will meet all of the requirements for designation as an ETC set forth in section 214(e)(1) of the Act.
6. I am the corporate officer that will be responsible for certifying Centre's use of federal high-cost support.
7. Centre will use the federal high-cost support that it receives only to provide, construct, upgrade, and maintain facilities and services for which the support is intended.

8. Centre certifies that neither it nor any party to its application is subject to a denial of federal benefits, including Commission benefits, pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, as implemented in section 1.2002 of the Commission's rules.



David Gibbons

General Manager

Centre WISP Venture
Company, LLC

NOTARY

State of Pennsylvania
County of Centre

State of Pennsylvania

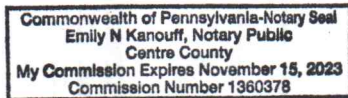
County of Centre

This record was acknowledged before me on 1/5/2021 (date)

By David Gibbons (name of individual)

Notary signature: Emily N Kanouff

Stamp:



My Commission expires on:

November 15, 2023

CERTIFICATE OF SERVICE

I, Carol E. Matthey, consultant to Centre WISP Venture Company, LLC, do hereby certify that I have filed the foregoing Petition for Designation as an Eligible Telecommunications Carrier by electronic mail delivery to:

Suzan D. Paiva
Assistant General Counsel
Verizon
900 Race Street, 6th Floor
Philadelphia, PA 19107
Suzan.d.paiva@verizon.com

John R. Evans
Small Business Advocate
Pennsylvania Office of Small Business Advocate
555 Walnut St., 1st Floor
Harrisonburg, PA 17101
jorevans@pa.gov

Tanya McCloskey
Acting Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut St., 5th Floor
Harrisonburg, PA 17101
tmccloskey@paoca.org

Barrett Sheridan
Assistant Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut St., 5th Floor
Harrisonburg, PA 17101
bsheridan@paoca.org

and that, in filing the Petition, I have complied with the service requirements of the Pennsylvania Public Utility Commission.

This, the 6th day of January, 2021.

/s/ Carol E. Matthey
Matthey Consulting LLC
5904 Devonshire Dr.
Bethesda, MD 20816
Phone: (240) 461-7816
E-mail: carol@mattheyconsult.com